

From: [Brown, Cynthia](#)
To: [Quinones, Edwin](#)
Subject: RE: 104(e) City of Pasadena - Following up on our Friday meeting please see below.
Date: Friday, March 08, 2013 9:51:25 AM

(b) (5)



Cynthia Brown
Removal Enforcement Coordinator
214-665-7480

From: Quinones, Edwin
Sent: Friday, March 08, 2013 8:18 AM
To: Brown, Cynthia
Subject: Fw: 104(e) City of Pasadena - Following up on our Friday meeting please see below.

From: Westfall, Constance
Sent: Friday, March 08, 2013 8:09:20 AM
To: Quinones, Edwin
Cc: Paul Sarahan
Subject: 104(e) City of Pasadena - Following up on our Friday meeting please see below.

1. At the time you acquired or operated the Site, did you know or have reason to know that any hazardous substance was disposed of on, or at the Site?
2. Identify
 - a. The dates of your ownership;
 - b. Any information or documents that relate to whether a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Site during the period that you owned the Site.
3. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing, or otherwise handling hazardous substances or materials at the Site.
4. Did you ever use, purchase, generate, store, treat, dispose, or otherwise handle at the Site any hazardous substances? If the answer to the preceding question is anything but an unqualified "no," identify:
 - a. In general terms, the nature and quantity of the non- hazardous substances so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.

- b. The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance so transported, used, purchased, generated, stored, treated, disposed, or otherwise handled.
 - c. The persons who supplied you with each such hazardous substance.
 - d. How each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - e. When each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - f. Where each such hazardous substance was used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
 - g. The quantity of each such hazardous substance used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.
5. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the Site during the period that you owned the Site. Provide copies of all documents associated with such an occurrence.
6. Did the Facility ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (RCRA)? If so, provide a copy of such notification.
7. Provide information about the Site, including but not limited to the following:
- a. Property boundaries, including a written legal description;
 - b. Location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c. Surface structures (e.g., buildings, tanks, etc.);
 - d. Groundwater wells, including drilling logs;
 - e. Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;
 - f. Any and all additions, demolitions or changes of any kind on, under or about the

Site, its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the site; and

g. All maps and drawings of the Site in your possession.

8. Provide all reports, information or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

9. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Site. For each such solid waste management unit, provide the following information:

a. A map showing the unit's boundaries and the location of all known solid waste management units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

b. The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;

c. The dates that the unit was in use;

d. The purpose and past usage (e.g., storage, spill containment, etc.);

e. The quantity and types of materials (hazardous substances and any other chemicals) located in each unit, and;

f. The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.

g. If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

10. Describe the conditions of the physical plant facility at the Site during the years you owned the Site. Your response is to include, but should not be limited to, the status of equipment (operating or dormant), general condition of the facility (e.g., leaking pipes, corroded drain or new piping installed), quality of maintenance (e.g., equipment in disrepair or inspected monthly), adherence to procedures (improper handling of chemicals, incomplete/absent

policies, quality of supervision) and management of the plant.

11. Identify all leaks, spills, or releases into the environment of any hazardous substances, pollutants, or contaminants that have occurred at or from the Site? In addition, identify:

- a. When such releases occurred;
- b. How the releases occurred (e.g. when the substances were being stored, delivered by a vendor, transported or transferred (to or from any tanks, drums, barrels, or recovery units), and treated).
- c. The amount of each hazardous substances, pollutants, or contaminants so released;
- d. Where such releases occurred;
- e. Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.
- f. Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface), or air testing undertaken; and
- g. All persons with information relating to these releases.

12. [Drains inside/under a building] Was there ever a spill, leak, release or discharge of hazardous substances into any subsurface disposal system or floor drain inside or under the [PRP] building? If the answer to the preceding question is anything but an unqualified "no", identify:

- a. Where the disposal system or floor drains were located;
- b. When the disposal system or floor drains were installed;
- c. Whether the disposal system or floor drains were connected to pipes;
- d. Where such pipes were located and emptied;
- e. When such pipes were installed;
- f. How and when such pipes were replaced, or repaired; and
- g. Whether such pipes ever leaked or in any way released hazardous substances into the environment.

13. Has any contaminated soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an

unequivocal "no", identify:

- a. Amount of soil excavated;
- b. Location of excavation;
- c. Manner and place of disposal and/or storage of excavated soil;
- d. Dates of soil excavation;
- e. Identity of persons who excavated or removed the soil;
- f. Reason for soil excavation;
- g. Whether the excavation or removed soil contained hazardous substances and why the soil contained such substances;
- h. All analyses or tests and results of analyses of the soil that was removed from the Site;
- i. All persons, including contractors, with information about (a) through (h) of this request.

14. Provide information and documentation concerning all inspections, evaluations, safety audits, correspondence and any other documents associated with the conditions, practices, and/or procedures at the Site concerning insurance issues.

15. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

- a. What the nature and scope of these investigations will be;
- b. The contractors or other persons that will undertake these investigations;
- c. The purpose of the investigations;
- d. The dates when such investigations will take place and be completed; and
- e. Where on the Site such investigations will take place.

16. Describe the waste generation history of the Site, including all controlled and uncontrolled releases of compounds, reactants, products, waste, and any other substance. In your response list all releases by compound, the amount of release and the circumstances surrounding said release between _____ and _____.

17. Describe the waste handling and disposal history of the Site, for all facilities and all operations, including but not limited to transportation, shipping and/or receiving, storage, manufacturing, research, quality control, waste containment, and waste disposal facilities, between _____

and _____. This description is to include the names, addresses and activities of waste disposal contractors, and copies of all supporting documents (manifests, invoices, contracts, etc.).

18. Describe all instances where the Site accepted waste from any company or person, or where the Site accepted substances which could be considered hazardous and not useful in their present form. Your response is to include the following:

- a. a description of the waste sent to the Site;
- b. the types and quantity of the waste sent to the Site;
- c. the name of the person or company who transported the waste to the Site;
- d. the name of the person or company who sent the waste to the Site;
- e. the names of the person or company who originated the waste sent to the Site;
- f. the date(s) such wastes were sent to the Site;
- g. the state (i.e., liquid, solid, or gaseous) of the wastes sent to the Site, and the manner in which the wastes were stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
- h. a description of what the Site would do with the waste once received;
- i. the reason which led you to believe that the waste received was indeed waste when received by the Site Operator.
- j. the names of all customers who would receive a finished product which was composed of any waste described in this question.

19. Describe all instances where the Site accepted substances which could be considered off-spec. "Off-spec" is intended to mean a substance that in its current form is not useful for its intended purpose. Off-spec materials are often experimental products and/or substances which did not live up to expectations; or product and/or substances which did not meet the level of quality required for its intended purpose, i.e. a contaminated batch of solvents. Your response is to include the following:

- a. a description of the substances sent to the Site;
- b. the types and quantity of the substances sent to the Site;
- c. the name of the person or company who transported the substances to the Site;

- d. the name of the person or company who sent the substances to the Site;
- e. the names of the person or company who originated the waste sent to the Site,
- f. the date(s) such substances were sent to the Site;
- g. the state (i.e., liquid, solid, or gaseous) of the substances sent to the Site, and the manner in which the substances were stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
- h. a description of what the Site Operator would do with the substances once received;
- i. the reason which led you to believe that the substances received were off-spec in the form received by the Site.
- j. the names of all customers who would receive a finished product which was composed of any substances described in this question.

20. Describe all instances where the Site accepted substances which could be considered not hazardous in their present form. Your response is to include the following:

- a. a description of the substances sent to the Site;
- b. the types and quantity of the substances sent to the Site;
- c. the name of the person or company who transported the substances to the Site;
- d. the name of the person or company who sent the substances to the Site;
- e. the names of the person or company who originated the waste sent to the Site;
- f. the date(s) such substances were sent to the Site;
- g. the state (i.e., liquid, solid, or gaseous) of the substances sent to the Site, and the manner in which the substances were stored or disposed (i.e., drummed or uncontained, placed in lagoons, landfilled, placed in piles, etc.);
- h. a description of what the Site Operator would do with the substances once received;
- i. the reason which led you to believe that the substances received were not useful in the form received by the Site Operator.
- j. the names of all customers who would receive a finished product which was

composed of any substances described in this question.

21. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. the document retention policy between _____ and _____.
- b. a description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction.
- c. a description of the type of information that would have been contained in the documents.
- d. the name, job title and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; the person(s) who would have been responsible for the destruction of these documents; and the person(s) who had and/or still may have the originals or copies of these documents.
- e. the names and most current address of any person(s) who may possess documents relevant to this inquiry

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